



UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 1:13-md-02419

THIS DOCUMENT RELATES TO:

Hon. F. Dennis Saylor, IV

All Actions.

**CONSENT MOTION FOR EXTENSION OF TIME FOR PLAINTIFFS TO RESPOND
TO TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA'S
MOTION TO QUASH PLAINTIFFS' SUBPOENA**

With the consent of Travelers Property Casualty Company of American ("Travelers"), and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Plaintiffs hereby move the Court for an order extending Plaintiffs' time to file its response to Travelers' Motion to Quash Plaintiffs' Subpoena (Dkt. No. 633), from January 1, 2014 to and including January 10, 2014. Plaintiffs seek this short, stipulated extension to work with Travelers counsel to resolve any outstanding issues and to finalize the response.

WHEREFORE, Plaintiffs respectfully pray for an order extending its time to respond to the motion to January 8, 2014. A stipulated, proposed order has been submitted.

Respectfully submitted,

/s/ Marc E. Lipton
Marc E. Lipton
LIPTON LAW
18930 West Ten Mile Rd. Ste. 3000
Southfield, MI 48075
(248) 557-1688
(248) 557-6344 *facsimile*
marc@liptonlaw.com

Counsel for Plaintiffs

Dated: December 31, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this day of December 31, 2013, I electronically file the foregoing CONSENT MOTION FOR EXTENSION OF TIME FOR PLAINTIFFS TO RESPOND TO TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA'S MOTION TO QUASH PLAINTIFFS' SUBPOENA by using the CM/ECF system which will send a notice of electronic filing to all counsel of record and electronic mail on the following:

Brian M. Cullen
Law Office of Steven B. Stein
Two Financial Center
60 South Street, Suite 1000
Boston, MAW 02111-2759
(617) 772-2905
bcullen@travelers.com

/s/ Marc E. Lipton _____
Marc E. Lipton
LIPTON LAW
18930 West Ten Mile Rd. Ste. 3000
Southfield, MI 48075
(248) 557-1688
(248) 557-6344 *facsimile*
marc@liptonlaw.com

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 1:13-md-02419

THIS DOCUMENT RELATES TO:

All Actions.

Hon. F. Dennis Saylor, IV

**STIPULATED ORDER TO EXTEND TIME FOR PLAINTIFFS' RESPONSE TO
TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA'S
MOTION TO QUASH PLAINTIFFS' SUBPOENA**

Plaintiffs and Travelers Property Casualty Company of America ("Travelers"), through their respective counsel, having stipulated and agreed to the extension of time for Plaintiffs to respond to Travelers' Motion to Quash Plaintiffs' Subpoena (Dkt. No. 633) until January 10, 2014, and for good cause shown;

IT IS HEREBY ORDERED that the time by which Plaintiffs must respond to Travelers' Motion to Quash Plaintiffs' Subpoena is extended from January 1, 2014 to January 10, 2014.

Dated: December 31, 2013

/s/ Jennifer C. Boal

UNITED STATES MAGISTRATE JUDGE

So Stipulated and Agreed:

/s/ Marc E. Lipton

Marc E. Lipton
LIPTON LAW
18930 West Ten Mile Rd. Ste. 3000
Southfield, MI 48075
(248) 557-1688
marc@liptonlaw.com

Counsel for Plaintiffs

/s/ Brian M. Cullen

Brian M. Cullen
Law Office of Steven B. Stein
Two Financial Center
60 South Street, Suite 1000
Boston, MA 02111-2759
(617) 772-2905
bcullen@travelers.com

*Counsel for Travelers Property
Casualty Company of America*